


OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

**BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA**

* * * * *

In the Matter of Charges and Complaint
Against:
JEFFREY PATRICK NG, M.D.,
Respondent.

Case No. 22-29083-1

FILED
JUN - 2 2022
NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Donald K. White, J.D., Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Jeffrey Patrick Ng, M.D. (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

1. Respondent was at all times relative to this Complaint a medical doctor holding an active license to practice medicine in the State of Nevada (License No. 10928). Respondent was originally licensed by the Board on May 18, 2004.

2. Patient A² was a thirty-eight (38) year-old male at the time of the events at issue.

3. June 10, 2014, was the first time Patient A was seen by Respondent at CareMore for an annual exam and a physical exam required by his employer. At this visit Patient A had noted on the Patient History Form that he had a family history of heart attack, stroke and diabetes. Respondent's notes indicate Patient A felt well and had no complaints and that Patient A's blood pressure was 132/90, borderline high, and he was on medication for asthma and/or allergies.

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Bret W. Frey, M.D., Aury Nagy, M.D., and Col. Eric D. Wade, USAF (Ret.).

² Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 4. At this visit Patient A reported having pneumonia for three (3) months, in January
2 through March 2014, but still experienced being short of breath. There is a note within
3 Respondent's medical records indicating that Patient A had "Difficulty Breathing on Exertion." He
4 also noted that Patient A had increased anxiety. Respondent ordered several tests during this visit
5 including an EKG, blood work, chest x-ray and other diagnostic tests. Patient A was educated to
6 exercise and stay healthy. The test results received after this visit could be categorized as normal
7 other than an elevated cholesterol total of 207. The EKG was performed in office and the results
8 stated in pertinent part, "sinus bradycardia, possible anterior infarct, age undetermined," and
9 "Abnormal ECG."

10 5. Respondent's notes, after reviewing the test results, indicated no abnormalities.
11 However, the EKG results did contain abnormalities and Respondent misinterpreted it. Due to
12 Respondent's misinterpretation, he did not treat Patient A or refer him to a proper care provider for
13 these abnormalities.

14 6. On August 1, 2014, Patient A visited Respondent to follow up on the results of his
15 lab tests. Patient A had normal blood pressure measuring 120/74, but complained of heartburn and
16 regurgitation for the past three (3) months combined with burning epigastric pain. Respondent
17 prescribed Patient A Nexium, an oral medication for treatment of his peptic esophagitis, and told
18 Patient A to follow-up in two (2) weeks from the time of the visit. Patient A did not follow-up as
19 requested by Respondent for this digestion related issue.

20 7. Patient A next saw Respondent on August 20, 2014, complaining of cold
21 symptoms, specifically a sore throat, cough, and nasal congestion for the previous four (4) days.
22 Patient A was also still experiencing difficulty breathing on exertion. The medical record for this
23 visit also notes Dysphagia was present. Patient A was diagnosed with Strep pharyngitis and given
24 a prescription for Levofloxacin for seven (7) days. It was requested Patient A follow-up with
25 Respondent in two (2) weeks.

26 8. Patient A did not see Respondent again until May 1, 2015, and this was for another
27 physical exam for work. Routine lab tests were ordered, notes did not indicate complaints of
28 shortness of breath or chest pain, and his blood pressure was normal.

1 24. Continual failure by the Respondent to exercise the skill or diligence or use the
2 methods ordinarily exercised under the same circumstances by physicians in good standing
3 practicing in the same specialty or field is grounds for disciplinary action against a licensee
4 pursuant to NRS 630.306(1)(g).

5 25. Respondent continually failed to exercise skill or diligence ordinarily exercised by
6 his repeated inability to appreciate the symptoms of cardiopulmonary dysfunction, and instead
7 diagnosed Patient A with gastrointestinal reflux disease and asthma. Patient A did not respond
8 positively to the medications prescribed for asthma and gastrointestinal reflux disease and
9 continued to experience reflux and new onset back pain. Even though Patient A did not have
10 positive results with the medications and symptoms were increasing, Respondent did not evaluate
11 for, or recognize, the symptoms as potential cardiac dysfunction even though a diagnostic test
12 (EKG) had provided a clear indication that there was a potential cardiopulmonary dysfunction.
13 Respondent saw Patient A an additional five (5) times after the EKG results without referring him
14 to a cardiologist, providing him appropriate medication for cardiac dysfunction, nor sending the
15 patient for more detailed diagnostic testing.

16 26. By reason of the foregoing, Respondent is subject to discipline by the Board as
17 provided in NRS 630.352.

18 **WHEREFORE**, the Investigative Committee prays:

19 1. That the Board give Respondent notice of the charges herein against him and give
20 him notice that he may file an answer to the Complaint herein as set forth in
21 NRS 630.339(2) within twenty (20) days of service of the Complaint;

22 2. That the Board set a time and place for a formal hearing after holding an Early
23 Case Conference pursuant to NRS 630.339(3);

24 3. That the Board determine what sanctions to impose if it determines there has been
25 a violation or violations of the Medical Practice Act committed by Respondent;

26 4. That the Board award fees and costs for the investigation and prosecution of this
27 case as outlined in NRS 622.400;

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5. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 2nd day of June, 2022.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

DONALD K. WHITE, J.D.
Senior Deputy General Counsel
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Reno, NV 89521
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Attorney for the Investigative Committee

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VERIFICATION


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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Bret W. Frey, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

DATED this 2nd day of June, 2022.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

BRET W. FREY, M.D.
Chairman of the Investigative Committee

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am employed by the Nevada State Board of Medical Examiners and
3 that on the 3rd day of June, 2022, I served a file-stamped copy of the foregoing **COMPLAINT**,
4 via USPS Certified Mail and regular mail, to the following parties:

5 JEFREY PATRICK NG, M.D.
6 c/o Sean M., Kelly, Esq.
7 8329 West Sunset Road, Suite 260
8 Las Vegas, NV 89113
9 *Tracking No.:* **9171 9690 0935 0254 7602 69**
10 *Attorney for Respondent*

11 DATED this 3rd day of June, 2022.

12 
13 MERCEDES FUENTES
14 Legal Assistant
15 Nevada State Board of Medical Examiners
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